

Commonwealth of Massachusetts  
Department of Telecommunications and Energy

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Petition of NSTAR Electric	)	
for Approval of a New Renewable	)	D.T.E. 03-100
Power Supply Offering	)	
_____	)	

**Petition to Intervene of  
Constellation NewEnergy, Inc.**

Pursuant to 220 CMR § 1.03 Constellation NewEnergy, Inc. (“Constellation”) hereby petitions the Department of Telecommunications and Energy (the “Department”) for leave to intervene in the above-captioned proceeding.

In support of this petition, Constellation states as follows:

1. Constellation is a competitive retail electric supplier, licensed by the Department and serving customers throughout Massachusetts. Constellation is currently offering a renewable energy product to customers.
2. This proceeding concerns the petition of NSTAR Electric for approval of a new renewable energy product offering for residential, small commercial, and small industrial customers.
3. Constellation will be substantially and specifically affected by this proceeding. The product proposed by NSTAR Electric would compete directly with products offered by Constellation and other competitive suppliers. The proposed product would affect the development of the competitive electric market in general, and the market for green products in particular, and would affect the ability of Constellation and other suppliers to compete in those markets.

4. Constellation's participation will not impair the orderly conduct of this proceeding. Indeed, given Constellation's experience as a competitive supplier in other states across the country, its participation will assist the Department in its review of the issues raised herein.

5. Constellation seeks to participate as a full intervenor, and where appropriate, to participate in hearings, submit testimony, and submit comments.

WHEREFORE, Constellation respectfully requests that the Department grant its Petition to Intervene.

Respectfully submitted,  
CONSTELLATION NEWENERGY, INC.

By: \_\_\_\_\_  
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